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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA
GONZÁLEZ, FREDDY JOSE ARAPE RIVAS,
M.H., CECILIA DANIELA GONZÁLEZ
HERRERA, ALBA CECILIA PURICA
HERNÁNDEZ, E.R., and HENDRINA
VIVAS CASTILLO,

Plaintiffs,

v.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 25-cv-1766

**DECLARATION OF KATHERINE
GREENSLADE IN SUPPORT OF
PLAINTIFFS' MOTION TO POSTPONE
EFFECTIVE DATE OF AGENCY ACTION**

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DECLARATION OF KATHERINE GREENSLADE

I, Katherine Greenslade, make this declaration based on my own personal knowledge. If called to testify, I could and would do so as follows:

1. I am an attorney licensed with the Illinois state bar. I serve as the Director of The Resurrection Project ("TRP"), Immigrant Justice Legal Clinic in Chicago, Illinois. TRP has had a legal clinic for about 10 years (since 2014) that helps immigrants handle a wide variety of legal issues. I have led the legal clinic since joining TRP in 2018. TRP is connected to a large network of organizations throughout Illinois to increase access to justice.

2. Since approximately 2022, we have been serving significant numbers of Venezuelan immigrants, most of whom qualified for Temporary Protected Status (TPS). Around August 2022, buses carrying immigrants, mostly from Venezuela and Haiti, began arriving to Chicago from the southern border.

3. In response to this large number of recent arrivals, TRP developed large-scale workshops with city and state agencies to support applications for TPS and employment authorization (EADs). Legal representatives met with participants to determine eligibility for TPS or a parole-based EAD. Following pilot workshops in October 2023, TRP started offering large-scale workshops in Chicago in November 2023. These workshops have continued in various iterations since that time to assist TPS holders, including with EADs. Thousands of individuals seeking TPS at our workshops have been Venezuelan. From September 1, 2023 through February 18, 2025, 10,730 Venezuelans have attended these workshops. Almost a third of the Venezuelans at the workshops (3,072) have been children.

4. The first workshops served all eligible new arrivals who were living in a city-operated shelter and who qualified for work authorization. Conducting these workshops gave me an understanding of the particular challenges facing the population of Venezuelans who felt compelled to migrate to the United States over the last few years. The immigrants we served were low-income, arriving with few possessions and little to no money.

5. Because of time and resource constraints, TRP generally has been unable to conduct full screenings of individuals who participate in these workshops to determine whether, in addition

1 to TPS, they might be eligible for other types of immigration relief, such as asylum. Based on my
2 experience and observations at these workshops, the vast majority of persons who seek assistance
3 from TRP do not have access to private legal counsel to determine what other types of immigration
4 relief, aside from TPS, may be available to them that would allow them to remain in the U.S.

5 6. If TPS designation for Venezuela is terminated, then TPS holders will lose
6 protection from removal and the legal right to work in the U.S. that TPS provides. TPS holders like
7 the ones served in our workshops also may be subject to expedited removal if they have been in the
8 United States for less than two years and fail to convince an immigration officer that they have a
9 credible fear of persecution or torture if returned to Venezuela.

10 7. Since late 2022, as Chicago continued to receive buses of immigrants from the US
11 Southern border, I have conducted screenings for asylum eligibility for many Venezuelans. Based on
12 my experience and observations, TPS holders from Venezuela have fled for a wide variety of
13 compelling reasons relating to health and safety. Some have valid asylum claims, but many of the
14 people I spoke to described hardships and deprivations in Venezuela that created conditions of
15 desperation and grinding poverty, but which may not meet the narrow specific legal criteria for
16 asylum, leaving TPS as the only safety valve for them to avoid being forced to return to a country
17 where they genuinely fear imminent harm.

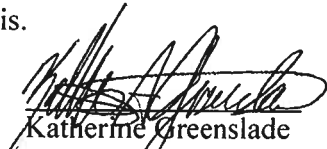
18 8. The people we served in TRP workshops and clinics represented a broad cross section
19 of Venezuelan society. They have included individuals and families of all ages—infants, teenagers,
20 adults, and the elderly. Many had no choice but to walk from Venezuela with infants and toddlers in
21 tow—arduous and risky journeys that no parent would undertake unless they fervently believed that
22 desperate circumstances had left them with no other choice but to flee Venezuela. As a parent of
23 young children, it is difficult to imagine just how bad conditions in Venezuela must be for
24 individuals from all walks of life to come to the conclusion that the risks of hunger, thieves, and the
25 unknown along a 2,900+ mile route are preferable to remaining in Venezuela.

26 9. Once in the United States, their economic circumstances did not immediately
27 improve. Without work authorization, the Venezuelan immigrants I served in Chicago struggled to
28

1 survive. Many arrived during Chicago's harsh winter months lacking proper clothing and footwear,
2 some arriving to our workshops wearing flip flops.

3 I declare under penalty of perjury of the laws of the United States that the foregoing is true
4 and correct.

5 Executed on February 19, 2025, in Chicago, Illinois.

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7 Katherine Greenslade
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